



08 December 2014

Commanding Officer  
U.S. Coast Guard Marine Safety Center  
Attn: LCDR Chad Robuck  
U.S. Coast Guard Stop 7410  
4200 Wilson Blvd, Suite 400  
Arlington VA 20598-7410

**RE: Application for Acceptance of the Bawat™ Ballast Water Management System As an Alternate Management System**

In accordance with the regulations at 33 CFR 151.2026 and 46 CFR 161.060-12 and the policy promulgated in CG-OES Policy Letter 12-01, we are submitting an application for Acceptance as an Alternate Management System and for Use and Acceptance of existing test data. Bawat A/S received Administration Type Approval from DNV-GL on behalf of the Danish Administration on 31 October 2014.

As a result, Bawat A/S believes that all criteria for United States Coast Guard (USCG) acceptance as an Alternate Management System (AMS) have been met. The Enclosures to this letter contain all of the information required by Enclosure (1) to CG-OES Policy Letter 12-01 including the completed AMS Review Checklist and all required supporting documentation.

Additionally, Bawat A/S believes that, due to the approval by DNV-GL, the technical design, engineering and electrical drawings and diagrams meets or exceeds the design and construction requirements at 46 CFR 162.060-20. Therefore, these data are submitted in accordance with 46 CFR 161.060-12 for use and acceptance of existing test data for the purposes of review by the Marine Safety Center (MSC). However, some of the information required by the AMS Checklist items 1.1 and 1.11 is not presently available, nor was it submitted in support of our Type Approval application to the Danish Administration. Specifically, we understand that the Bills of Materials for the Bawat BWMS may lack specificity and information regarding specific standards to which the components, sub-components, electrical equipment, piping assemblages and enclosures comply (e.g., Class Rules, 46 CFR Subchapters F and/or J, ASTM, IEEE or similar accepted standards). Bawat acknowledges these data and information gaps and is working on developing solutions to these gaps for our U.S. Type Approval application package. However, in the meantime, we respectfully request that the Coast Guard accept this acknowledgement of these

gaps and conduct the AMS Review Process so that the Bawat BWMS can receive Acceptance as an Alternate Management System as soon as possible.

After we further review the additional documentation and testing requirements contained in 46 CFR 162.060 and consult with the Coast Guard accepted Independent Lab(s), we anticipate an additional submission of data in accordance with 162.060-12.

This dossier was completed with the assistance of Gary Croot (IMESA, Inc.) and Jon Stewart (IMTCI) in the United States. We authorize both Mr. Croot and Mr. Stewart to act on our behalf during the processing and review of this Application for Acceptance as an Alternate Management System. Any questions or clarifications needed during the review process can be directed to them to help expedite this Application. Their contact information is included at the end of this letter.

Respectfully,



Kim Diederichsen  
Chief Executive Officer  
Bawat A/S

Enclosures:

- (1) Checklist for Responses to CG-OES Policy Letter 12-01
- (2) Alternate Management System Checklist for Bawat BWMS
- (3) Alternate Management System Checklist Supplement for Bawat BWMS
- (4) List of Documents in Support of Bawat AMS Checklist and Application
- (5) Application for Use and Acceptance of Existing Test data in accordance with 46 CFR 162.060-12
- (6) Complete AMS Application Package on CD (3 copies)

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